

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In re:

TAYLOR REPINE

Chapter 13

Debtor

BK No. 21-12538-MDC

DEBTOR'S RESPONSE TO TRUSTEE'S MOTION FOR DISMISSAL
FOR FAILURE TO MAKE TIMELY PAYMENTS

AND NOW, comes Taylor Repine, debtor, by and through her undersigned counsel and requests that the Trustee's Motion for Dismissal be denied for the following reasons:

1. Debtor has attempted to make online payments through TSF and has been met with the following notice:

Thank you for contacting TFS Bill Pay Customer Support.

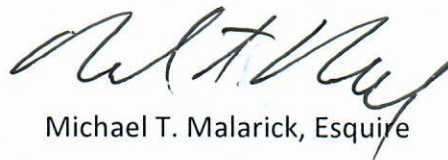
It appears your trustee has not yet updated your case status. ...

2. Debtor has indicated she will be forwarding certified checks/money orders to the physical address until the online payment method has been rectified.

WHEREFORE, Taylor Repine, debtor, respectfully requests that this Honorable Court deny the Trustee's motion for dismissal.

21/02/2021

Respectfully submitted,



Michael T. Malarick, Esquire

Attorney for Debtor